REMARKS

This is in response to the Office Action dated October 19, 2004. Claims 8-18, 25-40, 46, and 48-52 are pending.

Claim 8 stands rejected as being allegedly anticipated by Ohtani. This Section 102 rejection is respectfully traversed for at least the following reasons. Claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: **d = λ/(2 x n) x m**. Ohtani fails to disclose or suggest this.

Ohtani in Fig. 1 discloses an LCD including ITO pixel electrode 108, ITO auxiliary capacitance electrode 104, and capacitance insulator 105. Ohtani at col. 4, line 67 teaches that the thickness (d) of the capacitance insulator 105 should be defined by the following equation: d = λ/(4 x n).

In contrast with Ohtani, claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: **d = λ/(2 x n) x m**. Ohtani fails to disclose or suggest this. Ohtani's aforesaid equation [d = λ/(4 x n)] is not equal to the equation required by claim 8. For example, consider a scenario where n=2. When n=2, the equation of claim 8 would be: d = λ/4 x m. However, given the same exact scenario where n=2, the equation of Ohtani would be: d = λ/8. It can be seen that the result from Ohtani's equation is much different than the result of the equation required by claim 8. In particular, the equation required by claim 8 permits unexpected improved results as explained in the instant specification. Ohtani is entirely unrelated to the invention of claim 8 in this regard.

In paragraph 6, the Office Action contends that the equation of Ohtani "can be rewritten as d = λ/(2 x n) x m, wherein m=2" as required by claim 8. This allegation is incorrect (probably because the Examiner has incorrectly placed m in the denominator of the equation in claim 8).

In particular, Ohtani's equation cannot be rewritten to meet the equation of claim 8 as alleged by the Examiner in paragraph 6 of the Office Action. The Office Action's contention is mathematically incorrect. The Office Action incorrectly attempts to use "m" in the *denominator* of the equation, whereas claim 8 requires that "m" be in the *numerator* (e.g., see pg. 17). If "m" is an integer as alleged in the Office Action, it is impossible for Ohtani's equation to be rewritten to meet that of claim 8 because m is in the numerator in the equation of claim 8 (in claim 8, only the parenthetical is in the denominator as will be appreciated by those of ordinary skill in the art).

Claims 15, 33, 46 and 49 define over the cited art in a similar manner.

For at least the foregoing reasons, it is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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